

**UNITED STATES OF AMERICA
UNITED STATES DISTRICT COURT
THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION. NO.: _____

JAMES GUERTIN,)	
PLAINTIFF)	
)	
v.)	
)	
NELSON DARAZI,)	
DEFENDANT)	

COMPLAINT

INTRODUCTORY STATEMENT

1. This is a civil action by the plaintiff seeking to recover compensatory damages for personal injuries arising out of the negligent driving of the defendant.

PARTIES

2. The plaintiff, James Guertin, is a citizen of the United States and a resident of Orleans, Orleans County, Vermont.
3. The defendant, Nelson Darazi, is an individual residing in North Attleboro, Bristol County, Massachusetts.

JURISDICTION

4. This Court has jurisdiction on the grounds that there is complete diversity of citizenship and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

FACTS

5. On or about January 30, 2009, the plaintiff, James Guertin, was lawfully and properly operating his motor vehicle on a public way known as Emory Street in Attleboro, Bristol County, Massachusetts.
6. On the same date and time the defendant, Nelson Darazi, was operating a motor vehicle on a public way known as Torrey Street in Attleboro, Bristol County, Massachusetts.
7. At the same time and place, the defendant so negligently operated his motor vehicle so as to collide with the plaintiff's motor vehicle.
8. This motor vehicle accident resulted from the negligent and careless operation of a motor vehicle by the defendant Nelson Darazi.
9. As a direct and proximate result of the negligence of the Defendant, the Plaintiff was caused to sustain severe, permanent personal injuries, was caused to be disabled and will be disabled in the future, was caused and will be caused great pain of body and mind, and has been caused to incur and will continue to incur great medical and hospital expenses for said injuries. Plaintiff's ability to enjoy life and attend to his usual activities has been greatly damaged.

WHEREFORE, the plaintiff, James Guertin, demands judgment against the defendant, Nelson Darazi plus interest and costs of this action.

THE PLAINTIFF CLAIMS A JURY TRIAL ON ALL COUNTS.

The Plaintiff,
James Guertin
By his attorneys,



Edward F. Wallace, Esq. BBO # 513540
Laura Sheppard, Esq. BBO# 634517
Law Offices of Edward F. Wallace, P.C.
270 Littleton Road, Unit 22
Westford, MA 01886
(978) 589-9995

Dated: 5/27/11